

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in compliance with D.N.J. LBR 9004-1(b)**

**PACHULSKI STANG ZIEHL & JONES LLP**

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*Counsel to Arnold & Itkin LLP*

In re:

LTL MANAGEMENT LLC,

Debtor.<sup>1</sup>

Chapter 11

Case No. 21-30589 (MBK)

Hearing Date and Time:  
Feb. 15, 2022 at 10:00 a.m. (ET)

**NOTICE OF MOTION TO DISMISS BANKRUPTCY CASE**

**PLEASE TAKE NOTICE** that, on February 15, 2022 at 10:00 a.m., or as soon thereafter as counsel may be heard, the law firm of Arnold & Itkin LLP (“Arnold & Itkin”), on behalf of certain personal injury claimants represented by Arnold & Itkin (the “Movants”), through its undersigned counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

dismissing this case pursuant to section 1112(b) of the Bankruptcy Code and Rule 1017 of the Federal Rules of Bankruptcy Procedure (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that, in support of the Motion, Arnold & Itkin will rely upon the declaration of Laura Davis Jones and the memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) Arnold & Itkin’s undersigned counsel, (b) Debtor’s counsel, (c) the proposed counsel to the Official Committee of Talc Claimants, (d) the proposed Future Claimants’ Representative and his counsel, and (e) any other party entitled to notice no later than seven (7) days prior to the hearing.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: December 9, 2021

**PACHULSKI STANG ZIEHL & JONES LLP**

By: /s/ Colin R. Robinson

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